

## **REMARKS**

Claims 1-21 are pending. Claims 1-3, 5-7, 9, 17, 19 and 21 have been amended. In view of the following, all pending claims are in condition for allowance. If, after considering this response, the Examiner does not agree that all of the claims are allowable, he is requested to schedule a teleconference with the Applicants' attorney to further the prosecution of the application.

### **Priority**

A certified copy of European Application No. 03425171.0 was previously filed on July 13, 2004.

### **Objection to claims 2-3 and 5-7**

Claims 2-3 and 5-7 have been amended to correct informalities.

### **Rejection of claim 7 under §112, second paragraph**

Claim 7 has been amended to overcome this rejection.

### **Rejection of claims 1-2, 5, 9-10, 12-14, 17 and 19-21 under §102(e) as being anticipated by Pittelkow et al (US 6,996,741)**

#### **Claim 1**

Claim 1, as amended, recites circuit means, functionally independent, each of them being responsible for the correction of a predetermined storage error of data stored in a non-volatile solid-state memory.

For example, referring, e.g., to paragraphs 2, 4, 10-12 and 36-39 of the present application, circuit means are responsible for the correction of a predetermined storage error of data stored in a non-volatile solid-state memory 2. Specifically, the non-volatile solid-state memory 2 may be a flash-type memory. It should be noted that the non-

volatile solid-state memory 2 is the primary data-storage unit of memory system 1, and that all error correction is for data stored in the non-volatile solid-state memory 2.

Pittelkow, on the other hand, does not disclose circuit means, functionally independent, each of them being responsible for the correction of a predetermined storage error of data stored in a non-volatile solid-state memory. Instead, Pittelkow discloses a storage area network (SAN) controller 102, 201 for controlling access to disk drives 110a-110d (FIGS. 1 and 2; col. 5, line 30 – col. 8, line 17). However, disk drives 110a-110d are simply conventional disk drives, which are completely different from solid-state memory. Solid-state memory such as NVRAM 228 is only used in Pittelkow to “retain a copy of the storage configuration information” of the system, not as the primary data-storage unit of the system (col. 7, lines 43-47). Furthermore, no error correction is ever performed on the actual data stored in solid-state memory such as NVRAM 228. In fact, after reviewing Pittelkow in its entirety, the Applicants’ attorney is unable to find any mention of performing error correction on data stored in a non-volatile solid-state memory. Therefore, Pittelkow does not satisfy the limitations of claim 1.

#### **Claims 9, 17, 19 and 21**

Claim 9, 17, 19 and 21, as amended, are patentable for reasons similar to those recited above in support of the patentability of claim 1.

#### **Claims 2, 5, 10, 12-14 and 20**

Claims 2, 5, 10, 12-14 and 20 are patentable by virtue of their respective dependencies from claims 1, 9 and 19.

#### **Rejection of claims 3-4, 6-8, 11 and 18 under §103(a) as being unpatentable over Pittelkow in view of Saxena et al. (US 5,533,035)**

Claims 3-4, 6-8, 11 and 18 are patentable by virtue of their respective dependencies from claims 1, 9 and 17.

**Rejection of claims 15-16 under §103(a) as being unpatentable over Pittelkow in view of Null (The Essentials of Computer Organization and Architecture)**

The Applicants' attorney respectfully points out that the citation of the Null reference is improper. The publication date of Null is listed only as "2003". But to be prior art to the present application, Null must have been published prior to March 19, 2003, which is the priority date of the present application. The Examiner is requested to either show proof that the Null reference was published prior to March 19, 2003, or withdraw this rejection in the absence of such proof.

## CONCLUSION

In light of the foregoing, claims 1-21 are in condition for allowance, which is respectfully requested.

If, after considering this response, the Examiner does not agree that all of the claims are allowable, then it is respectfully requested that the Examiner schedule a phone interview with the Applicants' attorney at (425) 455-5575.

Dated this 12<sup>th</sup> day of June, 2007.

Respectfully submitted,

GRAYBEAL JACKSON HALEY LLP



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J. Mark Han  
Attorney for Applicant  
Registration No. 57,898  
155 - 108th Avenue N.E., Suite 350  
Bellevue, WA 98004-5973  
Phone: (425) 455-5575  
Fax: (425) 455-1046